

REMARKS

The above-identified application is United States application serial number 09/616,330 filed on July 15, 2000. Claims 13-36 are pending in the application. Claims 13-36 are rejected under 35 U.S.C. 103(a). Applicant respectfully traverses these rejections.

Claim Rejections - 35 USC § 103

Claims 13-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kumar *et al.* (U.S. Patent Number 6,542,515), hereinafter referred to as Kumar, in view of Box *et al.* (Simple Object Access Protocol (SOAP) 1.1; May 2000). To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP § 2143. Failure to meet just one of the three prongs for the test of obviousness is sufficient to defeat rejection of the claims under 103(a).

Claim 13 recites:

“a protocol management framework for implementation of a predetermined transport protocol over the first messaging platform connection; a schema generator for, responsive to a request for service received over a second messaging platform connection, creating a document according to a predetermined format, the document containing information to be provided to another system over the messaging platform connection; an encoding component for converting a document in the predetermined format into a first encoded object that can be understood and used by the another system, the first encoded object being encoded according to a default encoding protocol; and a translation component for encoding a document in the predetermined format into a second encoded object that can be understood and used by the another system, the second encoded object being encoded according to an encoding protocol different from the default encoding protocol.”

In the present case, Applicant respectfully submits that there would be no reasonable expectation of success in combining the teachings of Kumar and Box because a SOAP message is an XML document that consists of a mandatory SOAP envelope, an

optional SOAP Header, and a mandatory SOAP Body. Notably, a SOAP message must not contain a Document Type Declaration (DTD). (Box *et al.*, SOAP v. 1.1, W3C Note 08 May 2000, Section 3).

Kumar discloses a combination of XML document type definition (DTD) documents transmitted via HTTP, and an adapter to unpack stacked request messages in the XML DTD for use in an Application Programming Interface (API). (Kumar, FIGs. 6 and 7, and col. 14 line 28 through col. 15 line 35.)

In Paragraph 44 of the Office Action, the Examiner quotes a portion of the Box reference that states “with the exception of the SOAP mustUnderstand attribute (see section 4.2.3) and the SOAP actor attribute (see section 4.2.2), it is generally permissible to have attributes and their values appear in XML instances or alternatively in schemas, with equal effect. That is, declaration in a DTD or schema with a default or fixed value is semantically equivalent to appearance in an instance.” (Emphasis added). Kumar does not, however, use a DTD or schema with default or fixed values for attributes. Kumar describes the DTD as comprising “a plurality of nested elements where at least one of the elements corresponds to a method in the profile manager or a profile itself. The element can include arguments required by the corresponding method.” (Kumar, col. 14 line 65 through col. 15 line 2.) The arguments are variables that indicate a request version identifier that uniquely identifies a given request message among many request messages that may be pending at any time, and variables that indicate the specific version of a method that is to be used. (Kumar, col. 15 line 5-20.) Since the DTD in Kumar does not define default or fixed values for attributes, but rather includes nested elements with variable arguments, such a DTD would not be allowed in a SOAP message. Thus, the DTDs used to transmit messages in Kumar cannot be used with SOAP, and therefore the combination of Kumar and Box has no reasonable expectation of success.

Claim 13 is distinguishable from Kumar and Box, alone and in combination, for at least the above-mentioned reasons. Claims 14-21 depend from Claim 13 and include features that further distinguish them from the prior art. Allowance of Claims 13-21 is respectfully requested.

Claims 22-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over Ankireddipally *et al.* (U.S. Patent Number 6,772,216), hereinafter referred to as Ankireddipally, in view of Young (U.S. Patent Number 6,560,606), hereinafter referred to as Young.

Claim 22 recites:

"An apparatus comprising:
logic instructions operable to:

...
create an encoder object upon receipt of the service request, wherein the encoder object identifies a handler that translates the request document to a document format required by the service component; and
transmit the encoder object and the request document to a system hosting the service component."

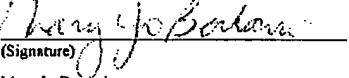
Ankireddipally is cited as suggesting such features, and Young is cited as teaching these features. The cited portions of Ankireddipally pertain to encoding, translating, and interpreting input and output parameter data types; sending a request to perform a service including data for arguments required to perform the service, and boilerplate language at the end of the detailed description stating that the claims are not limited to the specific embodiments of the description. (Ankireddipally, col. 17 lines 23-30, col. 18 lines 9-23, col. 26 lines 9-17). The cited portion of Young pertains to an application programming interface (API) that reformats data as required, an object generator that generates session objects containing properties with values representing the usage data, and a transmission module that includes a serializer, an encoder, and a transmitter. The encoder encodes the object stream for error detection purposes and/or authentication purposes. (Young, col. 6 lines 46-67).

Nothing in Ankireddipally or Young, alone or in combination, discloses or suggests an encoder object that identifies a handler that translates the request document to a document format required by the service component, or transmits the encoder object and the request document to a system hosting the service component, however, as set forth in Claim 22. The Examiner admits that Ankireddipally does not disclose or suggest an encoder object or transmitting the encoder object and the request document. (Office Action paragraph 24). The session objects in Young contain properties with values for the usage data. Further, the encoder in Young encodes the stream of session objects for error detection or authentication purposes. There is no feature in Young that is used to identify a handler or translate the request document to a document format required by the service component, as required by Claim 22.

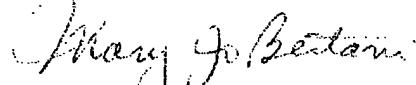
Claim 22 is distinguishable from Ankireddipally and Young, alone and in combination, for at least these reasons. Claims 23 - 36 depend from Claim 22 and include features that further distinguish them from the cited references. Allowance of Claims 22 -36 is respectfully requested.

CONCLUSION

Applicant believes Claims 13-36 are in form for allowance and a notice to that effect is solicited. In the event it would facilitate prosecution of this application, the Examiner is invited to telephone the undersigned at (949) 251-0250.

I hereby certify that this correspondence is being facsimile transmitted to the USPTO, Central Number at (703) 872-9106 on the date shown below.

(Signature)
Mary Jo Bertani
(Printed Name of Person Signing Certificate)
May 23, 2005
(Date)

Respectfully submitted,



Mary Jo Bertani
Attorney for Applicant(s)
Reg. No. 42,321